

Exhibit A

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(Additional counsel on signature page)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

CLASS ACTION

**ADVERTISER PLAINTIFFS' SECOND
SET OF INTERROGATORIES TO
DEFENDANT META PLATFORMS, INC.**

7. With respect to any information for which You wish to assert a claim of privilege, please provide the information required by the applicable Privilege Protocol. *See Klein v. Meta Platforms, Inc.*, Case No. 3:20-cv-08570-JD (N.D. Cal.), Dkt. 176.

8. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as a singular, whenever appropriate, in order to bring within the scope of these Interrogatory any information that would otherwise not be brought within their scope.

9. The use of the present tense shall be construed to include the past tense, and vice versa, so as to make the Interrogatory inclusive rather than exclusive.

10. The words “any” and “all” each shall be construed to mean both any and all.

11. None of the Definitions, Instructions, or Interrogatories shall be construed as an admission relating to the existence of any evidence, to the relevance or admissibility of any evidence, or to the truth or accuracy of any statement or characterization in those Definitions, Instructions, or Interrogatories.

12. Unless otherwise specified, these Interrogatories seek information during the period January 1, 2012 through the present.

13. The following Interrogatories are continuing in nature pursuant to Rule 26(e) of the Federal Rules of Civil Procedure so as to require You to promptly furnish supplemental answers whenever You obtain different or additional knowledge, information, or believe relative to these Interrogatories, up to and including through the time of trial.

INTERROGATORIES

INTERROGATORY NO. 4:

Identify and describe, with specificity, all information and data—including but not limited to call logs, video logs, text message logs, text message content, app usage information, and battery or power consumption logs—that Facebook obtained through, or derived from, Onavo, Onavo apps (e.g., Onavo Protect), or Meta’s Onavo team.

INTERROGATORY NO. 5:

Identify and describe, with specificity, all data, including what Meta internally refers to as “signal,” “intent,” “identity,” or “offsite signal” data, that Meta received from Google, Netflix, eBay, or Amazon, respectively, pursuant to agreements or otherwise.

INTERROGATORY NO. 6:

Identify and describe, with specificity, all storage systems and databases, including Facebook’s Hive, in which user data collected through Onavo or its apps was at any time or is currently stored.

INTERROGATORY NO. 7:

Identify and describe, with specificity, all data and AI/machine learning models obtained, derived, trained and/or validated using data collected by Onavo or through Onavo apps (e.g., Onavo Protect).

INTERROGATORY NO. 8:

Identify and describe, with specificity, all machine learning and AI systems used to match users while “offsite” (as that word is used at Meta) to their Facebook IDs, Facebook profiles, and/or “shadow” profiles.

Dated: July 25, 2022

BATHAE DUNNE LLP

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